

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	CRIMINAL NO. 4:20-CR-156
	§	
FAHAD H. SHAH	§	

BILL OF PARTICULARS

The United States of America, by and through the undersigned Assistant United States Attorney, and pursuant to Federal Rule of Criminal Procedure 32.2(a), particularly alleges that the following property is subject to forfeiture on the basis of the forfeiture allegations set forth in the indictment filed in the above-styled criminal case:

U.S. Currency:

- (1) \$69,480.00 in U.S. currency
- (2) \$10,000.00 in U.S. currency
- (3) \$1,977.00 in U.S. currency
- (4) \$1,127.00 in U.S. currency
- (5) \$900.00 in U.S. currency

Bank/Investment Accounts:

- (1) \$7,856.85 seized from Wells Fargo Account #XXXXX8264
- (2) \$43,626.89 seized from E-Trade Securities, LLC Account #XXXXX8039

Vehicles:

- (1) 2020 Tesla Model 3, VIN 5YJ3E1EBXLF719969
- (2) 2020 Tesla Model 3, VIN 5YJ3E1EB2LF668077
- (3) 2009 Freightliner M2 106 medium duty conventional cab
(VIN 1FVACWDT49HAF6849)

- (4) 2014 Freightliner M2 106 medium duty conventional cab
(VIN 3ALACWDT2EDFV8098)
- (5) 2014 Mercedes Benz Sprinter van (VIN WDYPE8DC0E5927890)

Miscellaneous Property:

5axismaker 5xm 3D printer

Cash Proceeds

A sum of money equal to \$1,592,657.00 in United States currency, and all interest and proceeds traceable thereto, representing the amount of proceeds obtained by the defendant as a result of the offenses alleged in the indictment, for which the defendant is personally liable.

The above described property that is sought for forfeiture includes property originally sought for forfeiture within the indictment and newly added property that is sought for forfeiture solely through this Bill of Particulars.

Respectfully submitted,

JOSEPH D. BROWN
UNITED STATES ATTORNEY

/s/ Robert Austin Wells
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing instrument was served on counsel of record for defendant via the Court's CM/ECF filing system on September 25, 2020.

/s/ Robert Austin Wells
ROBERT AUSTIN WELLS